

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmorland,)	
)	
<i>Plaintiff,</i>)	
)	23-cv-1851
-vs-)	
)	Judge Tharp, Jr.
Thomas Dart, Sheriff of Cook)	
County, et al.,)	
)	Magistrate Judge Gilbert)
<i>Defendants.</i>)	

**DEFENDANT COOK COUNTY'S SUPPLEMENTAL ANSWERS TO
PLAINTIFF'S REQUESTS FOR ADMISSION #3-4, 10-11, 13-14**

Defendant, COOK COUNTY, by counsel, DEVORE RADUNSKY LLC and for their Supplemental answer to Plaintiff's Requests for Admission #3-4, 10-11, 13-14, pursuant to Rule 36 of the Federal Rules of Civil Procedure, states as follows:

1. The RTU has two pedestrian tunnels that connect to the campus at the Cook County Jail. *See* Davis Dep 10:5-18.

ANSWER: Admit

2. One pedestrian tunnel is depicted as the "east tunnel" on the drawing produced by defense counsel as CCSAO Westmoreland 002224.

ANSWER: Admit

3. The "east tunnel" has a rise greater than 40 inches.

ANSWER: This defendant lacks knowledge to either admit or deny the request following a reasonable inquiry. See also Eric Davis dep pp. 27, 41-45, 59 & 79.

4. The "east tunnel" is at least 53 feet long. *See* CCSAO Westmoreland 002224.

ANSWER: This defendant lacks knowledge to either admit or deny the request following a reasonable inquiry and review of Westmoreland 002224.

5. The “east tunnel” has handrails.

ANSWER: Admit

6. The horizontal run of the “east tunnel” is split into two ramp runs with an intermediary landing.

ANSWER: Admit

7. There is an intermediate landing on the “east tunnel.” See Davis (9/21/2023) Dep 40:11-13; CCSAO Westmoreland marked 002224.

ANSWER: Admit

8. The 2010 ADA Standards for Accessible Design provides a landing clear length shall be 60 inches long minimum. 36 C.F.R. part 1191, App. D § 405.7.

ANSWER: Admit

9. The architectural drawing produced as CCSAO Westmoreland 002224 depicts an intermediate landing 60 inches long on the “east tunnel.”

ANSWER: Admit

10. The intermediate landing on the “east tunnel” is less than 60 inches long.

ANSWER: This defendant lacks knowledge to either admit or deny the request following a reasonable inquiry. See also Eric Davis dep p. 27, 41-45, 59 & 79.

11. The intermediate landing on the “east tunnel” is less than 45 inches long.

ANSWER: This defendant lacks knowledge to either admit or deny the request following a reasonable inquiry. See also Eric Davis dep p. 27, 41-45, 59 & 79.

12. The “north tunnel” is depicted in the architectural drawing produced by defense counsel as CCSAO Westmoreland 002223.

ANSWER: Admit

13. The “north tunnel” is more than 50 feet long.

ANSWER: This defendant lacks knowledge to either admit or deny the request. See also Eric Davis dep p. 52.

14. The “north tunnel” has a rise greater than 20 inches.

ANSWER: This defendant lacks knowledge to either admit or deny the request following a reasonable inquiry. See also Eric Davis dep pp. 25

15. There are no handrails on the “north tunnel.”

ANSWER: Admit

**VERIFICATION FOR DEFENDANT COOK COUNTY'S ANSWERS TO
PLAINTIFF'S REQUEST TO ADMIT**

I, Eric Davis, Deputy Director of Capital Planning and Policy – Cook County Bureau of Asset Management, under penalties as provided by law pursuant to 28 U.S.C. § 1746, certify that the statements set forth in *Defendant Cook County's Supplemental Answers to Plaintiffs Request to Admit #3-4, 10-11, 13-14* are true and correct to the best of my inquiry, knowledge, and belief. The statements provided herein are not based on my personal knowledge, sole or personal recollection, or memory, but rather were gathered by reviewing the records and documents in possession of Cook County, by consulting persons employed by Cook County, in coordination with and upon advice of undersigned counsel of record in this litigation.

Dated: 12/15/23

A handwritten signature in black ink, appearing to read "Eric Davis", is written over a horizontal line.

Eric Davis Deputy Director of Capital Planning
and Policy Cook County Bureau of Asset Management

CERTIFICATE OF SERVICE

I, Jason E. DeVore, state that on December 15, 2023, I served **COOK COUNTY'S SUPPLEMENTAL ANSWERS TO PLAINTIFFS REQUEST TO ADMIT # 3-4, 10,-11, 13-14** by email to the attorney listed below:

/s/ Jason DeVore
Jason DeVore
One of the Attorneys for Defendants

Service List:
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